

Comments of the Lexington Electric Utility Ad-hoc Committee

D.T.E. 03-87

October 9, 2003

Report of the Department of Telecommunications and Energy relative to reducing the number of double utility poles within the Commonwealth, pursuant to Chapter 46 of the Acts of 2003, Section 110.

The Lexington Electric Utility Ad-hoc Committee (EUAC), appointed by the Lexington Selectmen in February 2002 to address double poles and other problems related to electricity supply to the Town and its residents, appreciates the opportunity to file these additional comments. These comments supplement the presentations of Committee Chairman Paul Chernick and members Patrick Mehr and Ingrid Klimoff at the public hearing and technical session on September 30, 2003.

The Problem to be Addressed

As Lexington and other communities indicated at the public hearing and technical session, the utilities have failed to comply with G.L. c. 164, § 34B. This failure is widespread, blatant, and of long standing. Municipalities have coaxed, pleaded, and encouraged the utilities, but have been unable to resolve the aesthetic, safety, and economic-development issues raised by the proliferation and persistence of double poles.

Lexington's September 20 comments described the utilities' failure to meet their commitments to Lexington's Selectmen to remove double poles, or even to report on the creation and removal of double poles. Several municipalities reported on the utilities' refusal to remove double poles for years (even those resting in the roadway), despite the requirement in G.L. c. 164, § 34B that double poles be removed within 90 days.

Most of the utilities have not even been able or willing to comply with the Department's requirements regarding reporting on double poles. The "Notice of Public Hearing and Request for Comments" (September 10, 2003) required

Each telephone and electric company subject to G.L. c. 159 or 164 authority, will present information by municipality, concerning the number of double poles it owns or sets, and concerning their policies and practices to reduce, and to prevent accumulation of, double poles subject to their control.

Fitchburg Gas and Electric was the only utility to comply with the numerical reporting requirement. Massachusetts Electric provided aggregate data, suggesting that it probably has the required information by municipality, but chose not to respond to the Department's instructions.¹ NStar, Verizon, and Western Massachusetts Electric failed to provide any data on the number of double poles. The failure by NStar and Verizon is particularly distressing for the Lexington EUAC, since our committee invested considerable effort on correcting and updating the utility database and on encouraging the utilities to coordinate transfer of equipment off double poles. It appears that the utilities may have allowed the system to fall apart already. The double-pole data base recently reported about 250 double poles in Lexington; our committee has surveyed the entire town over the last week, and found 362 double poles, 5.7% of the 6,400 poles in Lexington. At least 184 of those double poles have been in place for over 15 months, and at least 77 have been in place for over 25 months. Attachment 1 provides the specific location and pole identification number of each of those 362 double poles. This attachment demonstrates how easy it is to inventory double poles, where the will exists.

As demonstrated in Attachment 2, Northeast Utilities (parent of Western Massachusetts Electric) management reported to its corporate board that it had intentionally deferred removal of double poles. This appears to have been a widespread reaction to restructuring and rate freezes. By intentionally violating G.L. c. 164, §34B, distribution companies can reduce operating costs and maximize returns to shareholders. The rate caps negotiated in the restructuring and merger settlement agreements were negotiated for continuation of full utility services, not to allow the utilities to collect revenues while eliminating or

¹ If Fitchburg G&E and Massachusetts Electric are removing double poles within the statutory deadlines, or are impeded only by slow response from Verizon and the cable companies (as some of the Fitchburg and Mass Electric data suggest), the legislation suggested below will have no effect on them.

diminishing functions required by law. The Department should clearly demonstrate to the utilities that these violations will no longer be tolerated.

Since the utilities have not complied with the existing law, some enforcement or incentive mechanism is required.

Verizon suggested during the technical session that the Department wait until an upcoming “Lexington pilot program” is completed before proposing any enforcement mechanism. The Lexington EUAC sees no merit in this vague proposal. Verizon has not provided any timetable, definition, workplan, or precise objectives for this alleged pilot program, or even correspondence between the utilities establishing the program. Considering the utilities’ failure to make any progress to date, to fulfill their promises to the Lexington Selectmen, or to comply with the Department’s instructions in this proceeding, we doubt that the pilot program will ever take any concrete form or produce more than ephemeral results, at least in the absence of financial penalties for non-compliance. Verizon and NStar have failed to maintain the database and procedures that the Lexington EUAC helped to develop through seven technical meetings and survey efforts during 2002 and have not been able to keep track of their double poles, as evidenced by their failure to file the required data in this proceeding and by their reporting only 250 of the 362 double poles in Lexington.

Since neither of these utilities has shown any interest in correcting the double-pole problem, postponement of an enforcement mechanism would be unjustified, and more importantly, counterproductive. The legislature has demanded the prompt removal for double poles since 1997; that goal will only be achieved by real financial incentives.

The Preferred Enforcement Mechanism

As Massachusetts Electric noted, utilities should not be subject to a wide variety of rules regarding the removal of double poles. The basic rule has been established by G.L. c. 164, §34B; double poles are to be removed within ninety days. The Lexington EUAC also proposes that the fine schedule and dispute-resolution mechanisms be set statewide.

If no statewide enforcement mechanism is developed, cities and towns will seek to create their own local penalties, which the legislature is likely to approve,

given its support for G.L. c. 164, §34B and Chapter 46 of the Acts of 2003, §110. The result would be exactly what Massachusetts Electric fears, a set of different deadlines, penalties, and enforcement mechanisms from locality to locality, increasing the utilities' administrative costs and possibly hampering statewide resolution of the double pole problem in a coordinated fashion. Massachusetts Electric should be supporting a statewide solution, not opposing it.²

That fine structure should include daily fines, rising over time. The Lexington EUAC recommends \$20/day for the first 30 days (days 91 to 120), \$30/day for the second 30 days (days 121 to 150), and \$40/day thereafter.

To make the enforcement process as simple as possible, the municipality should have the option of (1) fining the utility responsible for setting and maintaining the pole, or (2) splitting the fine between the joint owners of the pole. The responsibility for keeping records of which utility or tenant is next in line to move its equipment, and determining when the double pole can be removed, lies with the utilities, particularly the pole owners, not the municipality.³ The utilities receiving the fine should be allowed to charge other utilities or tenants that are responsible for the delay in removing the pole.⁴ Any disputes between utilities over the apportionment of fines should be adjudicated by the Department.

Similarly, the Department should be allowed to "stop the clock" on the double-pole fine calculation, for up to fifteen days at a time, if it finds that conditions beyond the utility's control render complying with G.L. c. 164, §34B impossible or imprudent. Those conditions might include labor actions and a range of weather-related problems: storms that require distribution crews to be diverted to repair; ice, wind and snow conditions that would make double-pole removal

² If Massachusetts Electric's data on its number of double poles are correct, it would be unlikely to pay any penalties under the system we propose herein.

³ Massachusetts Electric indicated that its contracts give tenants 15 days to move equipment off a double pole, and that the last owner off the pole (generally Verizon) is responsible for removing the old pole. This schedule should allow removal of the double pole within 90 days, even with multiple tenants, if the utilities maintain efficient scheduling systems.

⁴ If the municipality's own fire department is responsible for the delay, the utility would send the fine notice back to the municipality.

excessively dangerous; and storms that require the utility to provide mutual aid to other utilities.

Rather than requiring that municipalities take action to recover the fines from the utilities, the Lexington EUAC recommends that each municipality be allowed to credit accrued fines more than 30 days old against the utility bills of the municipality, its agencies and departments, and/or any regional governmental entity to which the municipality belongs. That would allow a town that is part of regional schools, sewer districts, or the like to apply the fines to offset those entities' utility bills. The municipality should be required to notify the utility when it is applying outstanding fines against bills, identifying the specific fines (by pole location and dates) being applied.

Enforcement of the uniform statewide rules and fines should be local. The municipalities should not need to file complaints with the Department, or file charges in district court, to fine utilities for these straightforward violations of state law. Nor should the Department be required to get involved in every routine enforcement action. A double pole left in place for more than ninety days is similar to an illegally-parked car; the municipality should be able to issue non-criminal fines, similar to parking tickets, through an officer designated by the board of selectmen or city council.

If these fines are not successful in achieving compliance with G.L. c. 164, §34B, it may be necessary to increase the effectiveness of G.L. c. 86 §7, which provides that "The aldermen or selectmen may cause the removal from public ways and places of unused poles, wires, structures or other appliances, at the expense of the owners thereof." A municipality could use this provision to hire a contractor to remove double poles, but the absence of a clear cost-recovery mechanism leaves municipalities with the risk and cost of litigation to recover such costs from the utilities. Municipalities have been reluctant to use their statutory powers. Allowing the municipalities to credit actual costs against their utility bills would make this provision more useful. Using fines to encourage utilities compliance with G.L. c. 164, § 34B is preferable to increasing municipal abilities to move utility equipment.

Comments of the Lexington Electric Utility Ad-hoc Committee

Attachment 1: Lexington Inventory of Double Poles

# double poles		At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1		86 Adams St	1/28	8/24/01	10/4/03		2.1	cl
1	at Woodlawn Rd	Adams St	1/12	8/24/01	10/4/03		2.1	cl
1		52 Albemarle Ave	158/7	10/3/03			unk	pm
1		57 Albemarle Ave	158/11	10/3/03			unk	pm
1	at Anthony Rd	Albemarle Ave	168/8	10/3/03			unk	pm
1	across	7 Alcott Rd	382/3	8/24/01	10/4/03		2.1	cl
1		8-10 Alcott Rd	382/2	8/24/01	10/4/03		2.1	cl
1	across	1 Anthony Rd	355/1	10/3/03			unk	pm
1	across	3 Anthony Rd	355/3	10/3/03			unk	pm
1		16 Audubon Rd	22/5	8/16/01	10/5/03		2.1	rmn
1		end of Bacon St	183/13-2	4/3/02	10/2/03		1.5	pm
1	at Concord Ave	Barberry Rd	244/50	7/11/01	10/1/03		2.2	pm
1	end of road	11 Barrymeade Dr	214/5	8/16/01	10/5/03		2.1	rmn
1	across	303 Bedford St	6/61	7/11/01	10/4/03		2.2	ik
1	across	325 Bedford St	6/65	10/5/03			unk	ik
1	in front of Holiday Inn, across	451 Bedford St	6/90	7/11/01	10/4/03		2.2	ik
1		537-541 Bedford St	6/108	10/8/03			unk	ks
2	across Beth Israel Medical Center	Bedford St	6/96A,6/97	7/11/01	10/4/03			2.2 ik
1		7 Bird Hill Rd	151/2	10/3/03			unk	pm
1		19 Bird Hill Rd	151/5	10/3/03			unk	pm
1	across	24 Bird Hill Rd	151/6	10/3/03			unk	pm
1	across	18 Blossom St	11/8	8/24/01	10/8/03		2.1	pm
1		21 Blossom St	11/10	10/8/03			unk	pm
1	at Blake St	Boulder Rd	302/1	10/8/03			unk	ks
1	across	3 Bow St	13/2	10/3/03			unk	pm
1	across	30 Bow St	13/6	10/3/03			unk	pm
1		39 Bow St	13/8	10/3/03			unk	pm
1		39 Bow St	13/7	10/3/03			unk	pm
1		91 Bow St	13/18	10/3/03			unk	pm
1	across	92 Bow St	13/17	10/3/03			unk	pm
1	across	96 Bow St	13/19	10/3/03			unk	pm
1		99 Bow St	13/20	10/3/03			unk	pm
1		107 Bow St	13/21	10/3/03			unk	pm
1	at bikepath	Bow St	13/3	4/3/02	10/3/03		1.5	pm
1	at Cliffe Ave	Bow St	13/4	10/3/03			unk	pm

# double poles	At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1	at Mass Ave	Bow St	13/1	10/3/03		unk	pm
1		3 Brent Rd	375/2	4/4/02 10/4/03		1.5	cl
1		5 Bridge St	59/1	7/11/01 10/2/03		2.2	pm
1	at Sanderson Rd	Bryant Rd	389/2	4/4/02 10/3/03		1.5	pm
1		125 Burlington St	14/31	10/8/03		unk	ks
1	at Longfellow	Burlington St	14/31	10/4/03		unk	cl
1		11 Carriage Dr	417/5	8/24/01 10/8/03		2.1	ks
1		23 Cedar St	17/5	10/4/03		unk	ik
1	across 27 Merriam	2 Chandler St	18/1	10/4/03		unk	cl
1		23 Charles St	121/3	5/17/02 10/1/03		1.4	pm
1		8 Circle Rd	167/2	10/3/03		unk	pm
1		38 Circle Rd	167/7	10/3/03		unk	pm
1	at Raymond St	Clarke St	19/5	4/22/02 10/5/03		1.5	rmn
1	@ Mass Ave across Cary Library	Clarke St	19/1	10/5/03		unk	rmn
1		42 Cliffe Av	120/8	8/16/01 10/3/03		2.1	pm
1		9 Cliffe Ave	120/1	10/3/03		unk	pm
1		12 Cliffe Ave	120/2	10/3/03		unk	pm
1		14 Cliffe Ave	120/3	10/3/03		unk	pm
1		16 Cliffe Ave	120/4	10/3/03		unk	pm
1	at Theresa Ave	22 Cliffe Ave	127/3	10/3/03		unk	pm
1		26 Cliffe Ave	120/5	10/3/03		unk	pm
1	at Fottler Ave	36 Cliffe Ave	120/6	10/3/03		unk	pm
1		40 Cliffe Ave	120/7	10/3/03		unk	pm
1		50 Cliffe Ave	120/9	10/3/03		unk	pm
1		58 Cliffe Ave	120/10	10/3/03		unk	pm
1	across	67 Cliffe Ave	120/12	10/3/03		unk	pm
1		70 Cliffe Ave	120/13	10/3/03		unk	pm
1		82 Cliffe Ave	120/14	10/3/03		unk	pm
1		94 Cliffe Ave	120/16	10/3/03		unk	pm
1	at Melrose Ave	Cliffe Ave	120/11	10/3/03		unk	pm
1		49 Colony Rd	80/9	10/4/03		unk	cl
1		58 Colony Rd	80/2	10/4/03		unk	cl
1	at Grant	Colony Rd	180/1	10/4/03		unk	cl
1	before	75 Concord Av	21/53	3/19/02 10/1/03		1.5	pm
1	at Pleasant St	190 Concord Av	21/31	8/24/01 10/1/03		2.1	pm
1	at Walnut St	206 Concord Av	21/28	3/19/02 10/1/03		1.5	pm
1	at Benjamin Rd	517 Concord Av	16/553	7/11/01 10/1/03		2.2	pm
1		46 Coolidge Pl	123/9	10/4/03		unk	cl
1		2-4 Cutler Farm Rd	233/1	4/21/01 10/2/03		2.4	pm
1		6-8 Cutler Farm Rd	233/3	4/21/01 10/2/03		2.4	pm
1	at Taft Ave	2 Daniels St	84/1	5/17/02 10/3/03		1.4	pm
1		5 Diehl Rd	320/2	3/17/02 10/8/03		1.6	pm
1		49 East St	27/8	8/16/01 10/4/03		2.1	cl
1		70 East St	27/11	8/16/01 10/4/03		2.1	cl
1		20 Eastern Ave	168/4	5/17/02 10/5/03		1.4	rmn

# double poles		At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1		along bikepath, behind CVS Edison Rd	39/3	4/4/02	10/5/03	+ in parking lot: wood attached to a pole	1.5	pm
1		24 Eldred St	282/5	5/17/02	10/8/03		1.4	ks
1		279 Emerson Rd	372/6	8/24/01	10/4/03		2.1	cl
1		29-31 Fairbanks Rd	296/14	4/1/02	10/1/03		1.5	pm
1		9 Fletcher Av	33/5	8/17/01	10/4/03		2.1	cl
1		33 Forrest St	35/7	10/5/03			unk	rmn
1	across	16 Fottler Ave	124/4	10/3/03			unk	pm
1	across	39 Fottler Ave	124/8	10/3/03			unk	pm
1	across	49 Fottler Ave	124/10	10/3/03			unk	pm
1	across	49 Fottler Ave	124/9	10/3/03			unk	pm
1		62 Fottler Ave	124/11	10/3/03			unk	pm
1		66 Fottler Ave	124/13	10/3/03			unk	pm
1		behind Enterprise Rent A Car Fottler Ave	124/2	10/3/03			unk	pm
1	at Upland	Glen Rd	38/2	10/4/03			unk	cl
1		Glen Rd South	38/11	5/13/02	10/4/03	pole leaning badly, held by rope tied to tree	1.4	cl
1		149 Grant St	22	10/4/03			unk	cl
1		153 Grant St	21	10/4/03			unk	cl
1		148? Grant St	23	10/4/03			unk	cl
1		10 Grapevine Ave	6/2	10/3/03			unk	pm
1		10 Grapevine Ave	6/3	10/3/03			unk	pm
1		18 Grapevine Ave	6/4	10/3/03			unk	pm
1		22 Grapevine Ave	6/5	10/3/03			unk	pm
1		28 Grapevine Ave	6/6	10/3/03			unk	pm
1		36 Grapevine Ave	6/8	10/3/03			unk	pm
1	across	6 Grove St	40/1	8/24/01	10/8/03		2.1	ks
1		19 Grove St	40/4	8/24/01	10/8/03		2.1	ks
1		109 Grove St	40/33	10/8/03			unk	ks
1		2 Hancock Av	41/1	8/17/01	10/8/03	253	2.1	ks
1		12 Hayes Ave	281/2	5/20/02	10/4/03		1.4	cl
1		92 Hill St	31	10/4/03			unk	ik
1		11 Holland St	143/2	10/1/03			unk	pm
1	at Concord Ave	14 Hutchinson Rd	317/1	8/24/01	10/1/03		2.1	pm
1		5 Jackson Ct	50/1	10/5/03			unk	rmn
1	before	4 Jean Rd	267/1	10/5/03			unk	rmn
1		4 Jean Rd	267/2	10/5/03			unk	rmn
1	at Aaron Rd	Jean Rd	267/3	10/5/03			unk	rmn
1		85 Kendall Rd	7/18	10/3/03			unk	pm
1	at Pleasant St	Lawrence Ln	343/21	8/24/01	10/8/03	small part of old pole left	2.1	pm
1		9 Lillian Rd	332/4	10/3/03			unk	pm
1	across	14 Lillian Rd	332/5	8/16/01	10/3/03		2.1	pm
1		15 Lillian Rd	332/6	10/3/03			unk	pm
1		19 Lillian Rd	332/8	10/3/03			unk	pm

# double poles	At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1	21 Lillian Rd	332/9	10/3/03			unk	pm
1	23 Lillian Rd	332/10	10/3/03			unk	pm
1	5-7 Lillian Rd	332/2	10/3/03			unk	pm
1	95 Lincoln St	55/22	10/5/03			unk	rmn
1	191 Lincoln St	55/32	10/5/03			unk	rmn
1	201 Lincoln St	55/33	8/16/01	10/5/03		2.1	rmn
1	219 Lincoln St	55/36	10/5/03			unk	rmn
1	257 Lincoln St	55/42	10/5/03			unk	rmn
1	263 Lincoln St	55/43	10/5/03			unk	rmn
1	island near Marrett @	271 Lincoln St	55/44	10/5/03		unk	rmn
1	across	336 Lincoln St	55/52	10/5/03		unk	rmn
1		347 Lincoln St	55/54	10/5/03		unk	rmn
1		351 Lincoln St	55/55	10/5/03		unk	rmn
1		357 Lincoln St	55/57	10/5/03		unk	rmn
1		375 Lincoln St	55/60	10/5/03		unk	rmn
1		377 Lincoln St	55/61	10/5/03		unk	rmn
1		381 Lincoln St	55/62	10/5/03		unk	rmn
1	before	400 Lincoln St	55/68	10/5/03		unk	rmn
1	after	404 Lincoln St	55/75	10/5/03		unk	rmn
1		435 Lincoln St	55/78	10/5/03		unk	rmn
1		439 Lincoln St	55/79	10/5/03		unk	rmn
1	after	443 Lincoln St	55/81	10/5/03		unk	rmn
1	island @ Barrymeade Rd	Lincoln St	55/51	10/5/03		unk	rmn
1		Lincoln St	55/53	10/5/03		unk	rmn
1		Lincoln St	55/76	10/5/03		unk	rmn
1		Lincoln St	55/77	10/5/03		unk	rmn
1		Lincoln St	55/82	10/5/03		unk	rmn
1	near Lincoln border	Lincoln St	55/83	10/5/03		unk	rmn
1	at Whipple Rd	3 Locke Ln	269/9	8/16/01	10/3/03	2.1	pm
1		26 Locke Ln	363/7	8/16/01	10/3/03	2.1	pm
1	at Lillian Rd	82 Lowell St	58/16	8/16/01	10/3/03	2.1	pm
1		96 Lowell St	58/18	10/3/03		unk	pm
1		114 Lowell St	58/21	10/3/03		unk	pm
1		165 Lowell St	9/29	5/22/02	10/8/03	1.4	pm
1		267 Lowell St	9/45	8/16/01	10/3/03	2.1	pm
1		191 Lowell St	9/33	4/4/02	10/3/03	1.5	pm
1		454-456 Lowell St	58/76	4/4/02	10/4/03	1.5	cl
1		654 Lowell St	58/130	4/4/02	10/4/03	1.5	cl
1		26 Maple St	61/7	8/16/01	10/3/03	2.1	pm
2	at Emerson Gardens	Maple St	61/18, 61/20	8/16/01	10/3/03	2.1	pm
1	Nat'l Heritage Museum	32 Marrett Rd	193/5	8/16/01	10/4/03	2.1	pm
1		348-352 Marrett Rd	193/60	4/1/02	10/2/03	1.5	pm
1	by Minuteman NHP	Marrett Rd	238	10/4/03		unk	ik
1	across Bacon St	Marrett Rd	193/26	4/3/02	10/2/03	1.5	pm
1	at Follen Rd	Marrett Rd	193/12	8/16/01	10/2/03	2.1	pm

# double poles		At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1	at Kendall Rd	Marrett Rd	193/46	8/16/01	10/2/03		2.1	pm
1	at Orlov	9 Marshall Rd	398/5	8/17/01	10/4/03		2.1	cl
1	at Orlov	5-7 Marshall Rd	398/4	8/17/01	10/4/03		2.1	cl
1		4 Mason St	281/1	5/25/02	10/1/03		1.4	pm
1		6 Mason St	281/2	5/25/02	10/1/03		1.4	pm
1		634 Mass Ave	57/38	5/31/02	10/3/03		1.3	pm
1		1303 Mass Ave	57/86	8/16/01	10/8/03		2.1	pm
1	across Town Hall	1620 Mass Ave	64/121	7/23/02	10/3/03		1.2	pm
1	across Town Hall	1620 Mass Ave	64/120	7/23/02	10/3/03		1.2	pm
1		2619 Mass Ave	57/189-1	10/4/03			unk	ik
1		2619 Mass Ave	57/189-1	10/5/03			unk	rmn
1	across	2361 Mass Ave	57/177	4/4/02	10/4/03		1.5	ik
1	at Lincoln border	Mass Ave	57/238	10/5/03			unk	rmn
1	by National Heritage Museum	Mass Ave	64/72	4/4/02	10/8/03	small part of old pole left	1.5	pm
1		220 Mass Ave	57/13	10/3/03			unk	pm
1	at Sylvia St	Mass Ave	57/4	10/3/03			unk	pm
1	at Taft Ave	Mass Ave	57/5	10/3/03			unk	pm
1	at Taft Ave	Mass Ave	57/6	10/3/03			unk	pm
1	at Bow St	Mass Ave	57/7	10/3/03			unk	pm
1	at Charles St	Mass Ave	57/11	10/3/03			unk	pm
1	across New Asia restaurant	Mass Ave	57/12	10/3/03			unk	pm
1	across	5 Melrose Ave	-/2	10/3/03			unk	pm
1		6 Melrose Ave	55/4	10/3/03			unk	pm
1	at Bow St	Melrose Ave	55/1	10/3/03			unk	pm
1	at bikepath	Meriam St	65/3	10/5/03			unk	pm
1		34 Middle St	66/9	5/27/02	10/5/03		1.4	rmn
1		82 Middle St	66/22	5/27/02	10/5/03		1.4	rmn
1		16 Middleby Rd	194/4	10/5/03			unk	rmn
1		24 Middleby Rd	194/5	10/5/03			unk	rmn
1		28 Middleby Rd	194/6	10/5/03			unk	rmn
1		40 Middleby Rd	194/9	10/5/03			unk	rmn
1		172 Middleby Rd	194/14	10/5/03			unk	rmn
1	after	172 Middleby Rd	194/15	10/5/03			unk	rmn
1	entrance to Bridge school	Middleby Rd	194/11	1/18/02	10/5/03		1.7	rmn
1		2-4 Morris St	114/1	4/1/02	10/8/03		1.5	ks
1		6 Morris St	114/2	4/1/02	10/8/03		1.5	ks
1		14 North Hancock St	71/3	4/1/02	10/8/03		1.5	ks
1	at Burlington St	North St	14/47	8/24/01	10/4/03		2.1	cl
1	corner	Norton Rd&Brandon St	(2?9/1)	4/3/02	10/3/03		1.5	pm
1	across	16 Oakland St	75/11	4/1/02	10/4/03		1.5	cl
1	second pole in	Oakmount Cir	172/2	5/10/02	10/4/03		1.4	cl
1	opposite Bonair Ave	Old mass Av	67/211	5/17/02	10/4/03		1.4	ik
1	near Bonair Ave	Old mass Av	211	10/8/03			unk	pm
1		1 Oxbow Rd	376/2	8/16/01	10/4/03		2.1	ik
1	near Revolutionary Rd	Oxbow Rd	376/1	4/21/01	10/4/03		2.5	ik

# double poles		At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1		9 Page Rd	392/5	5/22/02	10/3/03		1.4	pm
1		1 Payson St	62/1	7/11/01	10/2/03		2.2	pm
1	across	14 Payson St	62/3	7/11/01	10/2/03		2.2	pm
1		8 Peachtree Rd	257/5	10/4/03			unk	pm
1		14 Peachtree Rd	257/6	10/4/03			unk	pm
1		4 Peacock Farm Rd	277/2	5/10/02	10/1/03		1.4	pm
1		6 Peacock Farm Rd	277/3	5/10/02	10/1/03		1.4	pm
1		8 Peacock Farm Rd	277/4	5/10/02	10/1/03		1.4	pm
1		8 Peacock Farm Rd	277/5	5/10/02	10/1/03		1.4	pm
1		10 Peacock Farm Rd	277/6	5/10/02	10/1/03		1.4	pm
1		15 Peacock Farm Rd	277/8	5/10/02	10/1/03		1.4	pm
1		19 Peacock Farm Rd	277/9	5/10/02	10/1/03		1.4	pm
1		35 Peacock Farm Rd	277/17	5/10/02	10/1/03		1.4	pm
1		39 Peacock Farm Rd	277/19	5/10/02	10/1/03		1.4	pm
1	across	40 Peacock Farm Rd	277/20	5/10/02	10/1/03		1.4	pm
1		43 Peacock Farm Rd	277/22	10/1/03			unk	pm
1		43 Peacock Farm Rd	277/23	8/16/01	10/1/03		2.1	pm
1		45 Peacock Farm Rd	277/24	5/10/02	10/1/03		1.4	pm
1	across	46 Peacock Farm Rd	277/25	5/10/02	10/1/03		1.4	pm
1		49 Peacock Farm Rd	277/26	5/10/02	10/1/03		1.4	pm
1	at Watertown St	Peacock Farm Rd	277/1	5/10/02	10/1/03		1.4	pm
1		Percy Rd	78/5	10/3/03			unk	pm
1		64 Pleasant St	80/22	5/26/02	10/1/03		1.4	pm
1	@ Watertown St	66 Pleasant St	80/23	5/10/02	10/1/03		1.4	pm
1		93 Pleasant St	80/32	5/10/02	10/1/03		1.4	pm
1	at Watertown St	94 Pleasant St	80/30	5/10/02	10/1/03		1.4	pm
1		149 Pleasant St	80/50	8/24/01	10/1/03		2.1	pm
1		151 Pleasant St	80/51	8/24/01	10/1/03		2.1	pm
1	at Concord Ave	159 Pleasant St	80/53	8/24/01	10/1/03		2.1	pm
1	above Wilson Farms	Pleasant St	80/10	5/10/02	10/1/03		1.4	pm
1	above Wilson Farms	Pleasant St	80/6	5/26/02	10/1/03		1.4	pm
1	above Wilson Farms	Pleasant St	80/11	5/10/02	10/1/03		1.4	pm
1	above Wilson Farms	Pleasant St	80/12	5/10/02	10/1/03		1.4	pm
1	above Wilson Farms	Pleasant St	80/13	5/10/02	10/1/03		1.4	pm
1	above Wilson Farms	Pleasant St	80/15	5/10/02	10/1/03		1.4	pm
1	above Wilson Farms	Pleasant St	80/16	5/10/02	10/1/03		1.4	pm
2	by Farm parking lot	Pleasant St	80/9,80/8	5/10/02	10/1/03		1.4	pm
1	near Dover Lane	Pleasant St	80/33	5/10/02	10/1/03		1.4	pm
1		24 Prospect Hill Rd	182/4	1/18/02	10/5/03		1.7	rmn
1		64 Reed St	228/1	10/4/03			unk	ik
1	at Augustus Rd	64 Reed St	228/1	4/1/02	10/5/03		1.5	ik
1		44-46 Reed St	82/11	4/1/02	10/4/03		1.5	ik
1		5-7 Revolutionary Rd	?/3	8/16/01	10/4/03		2.1	ik
1	across	18 Rindge Ave	154/9	10/3/03			unk	pm
1	across	26 Rindge Ave	154/8	10/3/03			unk	pm

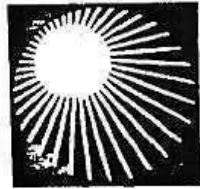
# double poles		At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1	across	32 Rindge Ave	154/7	10/3/03			unk	pm
1	across	48 Rindge Ave	154/4	10/3/03			unk	pm
1		27 Robbins Rd	25/8	8/16/01	10/3/03		2.1	pm
1	across	44 Robinson Rd	161/19	8/24/01	10/8/03		2.1	ks
1	at Davis Rd	Rockville Ave	223/5	4/3/02	10/1/03		1.5	pm
1	before	29 Roosevelt Rd	318/5	10/5/03			unk	rmn
1		29 Roosevelt Rd	318/6	10/5/03			unk	rmn
1		31 Roosevelt Rd	318/7	10/5/03			unk	rmn
3	by Diamond Middle School	Sedge Rd	379/6 379/7 379/8	4/4/02	10/4/03		1.5	cl
1		121 Shade St	87/8	4/11/02	10/1/03		1.5	pm
1		35 Shade St	87/29	4/1/02	10/1/03		1.5	pm
1		39-41 Shade St	87/28	4/1/02	10/1/03		1.5	pm
1		41-45 Shade St	87/27	4/1/02	10/1/03		1.5	pm
1		27 Sherman St	89/6	8/17/01	10/4/03		2.1	cl
1		11 Spencer St	180/3	4/3/02	10/8/03		1.5	pm
1		11-13 Spring St	90/3	7/11/01	10/1/03		2.2	pm
1	main entrance to Raytheon	Spring St	90/33	4/21/01	10/1/03		2.4	pm
1	Raytheon: across from	Spring St	90/34	4/21/01	10/1/03		2.4	pm
1	Raytheon: across from	Spring St	90/36	4/21/01	10/1/03		2.4	pm
1		11 Stimson Ave	342/3	10/5/03			unk	rmn
1		5 Stonewall Rd	273/4	4/11/02	10/1/03		1.5	pm
1		8 Sullivan St	37/2	4/1/02	10/8/03		1.5	ks
1	at Haskell St	Summer St	176/12	4/4/02	10/3/03		1.5	pm
1		50 Taft Ave	131/21	10/1/03			unk	pm
1		56 Taft Ave	131/23	10/1/03			unk	pm
1		58 Taft Ave	131/24	10/1/03			unk	pm
1		60 Taft Ave	131/25	10/1/03			unk	pm
1		64 Taft Ave	131/26	10/1/03			unk	pm
1		38 Tarbell Ave	137/7	5/26/02	10/1/03		1.4	pm
1		7 Theresa Ave	127/1	10/3/03			unk	pm
1		17 Theresa Ave	127/2	10/3/03			unk	pm
1	at Alcott Rd	Thoreau Rd	381/4	8/24/01	10/4/03		2.1	cl
1	at Burroughs Rd	Thoreau Rd	381/6	8/24/01	10/4/03		2.1	cl
1		4 Trotting horse Dr	268/2	5/8/02	10/1/03		1.4	pm
1		6 Trotting horse Dr	268/3	10/1/03			unk	pm
1		10 Trotting horse Dr	268/5	10/1/03			unk	pm
1		12 Trotting horse Dr	268/6	10/1/03			unk	pm
1	at Glen Rd	Upland Rd	38/2	10/5/03			unk	pm
1	across	49 Valleyfield St	53/13	7/11/01	10/2/03		2.2	pm
1	at Bridge St	Valleyfield St	53/8	3/20/02	10/2/03		1.5	pm
1		3 Wachusett ci	230/1	10/5/03			unk	rmn
1		82 Waltham St	195/5	10/2/03			unk	pm
1		256 Waltham St	195/27	10/2/03			unk	pm
1		292 Waltham St	195/38	10/2/03			unk	pm
1		292 Waltham St	195/39	7/11/01	10/5/03		2.2	rmn

# double poles	At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1	320 Waltham St	195/42	10/2/03			unk	pm
1	326 Waltham St	195/43	10/2/03			unk	pm
1	354 Waltham St	195/46	10/2/03			unk	pm
1	360 Waltham St	195/47	10/2/03			unk	pm
1	604 Waltham St	-/74	10/2/03			unk	pm
1	entrance Brookhaven	1010 Waltham St	195/127	3/30/02	10/2/03	1.5	pm
1	public lot, behind Coldwell Banker	rear 25 Waltham St	195/3-1	3/23/02	10/5/03	1.5	rmn
1	at Worthen Rd	Waltham St	195/28	10/2/03		unk	pm
1	btw Worthen & Marrett	Waltham St	195/32	10/2/03		unk	pm
1	btw Worthen & Marrett	Waltham St	195/33	10/2/03		unk	pm
1	btw Worthen & Marrett	Waltham St	195/35	10/2/03		unk	pm
1	btw Worthen & Marrett	Waltham St	195/36	10/2/03		unk	pm
1	btw Worthen & Marrett	Waltham St	195/44	10/2/03		unk	pm
1	btw Worthen & Marrett	Waltham St	195/45	10/2/03		unk	pm
1	at Grapevine Ave	Waltham St	195/48	10/2/03		unk	pm
1	across	4 Watertown St	109/1	5/10/02	10/1/03	1.4	pm
1	across	6 Watertown St	109/2	5/10/02	10/1/03	1.4	pm
1	across	10 Watertown St	109/3	5/10/02	10/1/03	1.4	pm
1	across	16 Watertown St	109/4	5/10/02	10/1/03	1.4	pm
1	across	18 Watertown St	109/5	5/10/02	10/1/03	1.4	pm
1	across	22 Watertown St	109/6	5/10/02	10/1/03	1.4	pm
1	across	26 Watertown St	109/7	5/10/02	10/1/03	1.4	pm
1	across?	28 Watertown St	109/8	5/10/02	10/1/03	1.4	pm
1	entrance to Pine Knoll nursing home	30 Watertown St	-2X	10/1/03		unk	pm
1	37 Watertown St	109/9	5/10/02	10/1/03		1.4	pm
1	41 Watertown St	109/10	5/10/02	10/1/03		1.4	pm
1	at Peacock Farm Rd	Watertown St	109/11	5/10/02	10/1/03	1.4	pm
1	at Crescent Rd	Watertown St	no ID#	10/1/03		unk	pm
1	at Peacock Farm Rd	Watertown St	109/12	5/10/02	10/1/03	1.4	pm
1	10 Wildwood Rd	249/5	10/4/03			unk	ik
1	across	39 Winchester Dr	272/24	8/16/01	10/3/03	2.1	pm
1	36 Winn Ave	153/1	10/3/03			unk	pm
1	84 Winter St	149/18	8/24/01	10/8/03		2.1	ks
1	at Hazel Rd	Winter St	149/6	8/24/01	10/8/03	2.1	ks
1	39 Winthrop Rd	113/19	8/24/01	10/3/03		2.1	pm
1	68 Woburn St	114/15	8/16/01	10/4/03		2.1	pm
1	at Manley Ct	79 Woburn St	114/17	8/16/01	10/4/03	2.1	pm
1	85 Woburn St	114/18	4/11/02	10/4/03		1.5	pm
1	183 Woburn St	114/36	8/16/01	10/4/03		2.1	pm
1	245 Woburn St	42/48	3/19/02	10/4/03		1.5	pm
1	253 Woburn St	42/49	8/16/01	10/4/03		2.1	pm
1	62 Wood St	115/12	7/11/01	10/4/03		2.2	ik
1	221 Wood St	115/40	10/4/03			unk	ik
1	277 Wood St	115/51	5/16/02	10/4/03		1.4	ik

# double poles	At # Street	Pole #s	on:	and on:	Comments	Min years w/ double pole	Oct 2003 survey by:
1	59 Wood St	115/11	4/1/02	10/4/03		1.5	ik
2	at Mass Ave Wood St	115/1, 115/1A	7/11/01	10/4/03		2.2	ik
1	25-27 Woodcliffe Rd	229/9	3/28/02	10/4/03		1.5	pm
1	37-39 Woodcliffe Rd	229/4	6/30/99	10/4/03		4.3	pm
1	41-43 Woodcliffe Rd	229/2	3/19/02	10/4/03		1.5	pm
1	12 Woodland Rd	138/5	10/4/03			unk	cl
1	32 Woodland Rd	13/1	10/4/03			unk	cl
1	18 Young St	344/6 or 18?	5/17/02	10/8/03		1.4	pm
1	18-20 Young St	344/6	8/17/01	10/4/03		2.1	cl
1	parking lot rear Depot	65 4/3 (BEC Co tag)	10/5/03			unk	pm
362	total double poles						

**Comments of the Lexington Electric
Utility Ad-hoc Committee**

**Attachment 2:
Excerpt from
Northeast Utilities Status Report
to
Corporate Affairs Committee,
Board of Trustees
May 20, 1997**



**Northeast
Utilities System**

Status Report

The Energy Delivery Business and Distribution System Reliability

**Corporate Affairs Committee
of the Board of Trustees
May 20, 1997**

Operational Performance

...and we have deferred maintenance

- Removing double poles
- Replacing old obsolete equipment
- Replacing direct buried cable
- Inspecting and treating our poles